



State of Ohio Environmental Protection Agency

Southwest District Office

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FERNALD
LOG K-2396

SEP 9 8 27 AM '97

George V. Radovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

FILE: 6446.6

RE: DOE FEMP
COMMENTS: O&M PLAN
FOR ARP

September 4, 1997

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

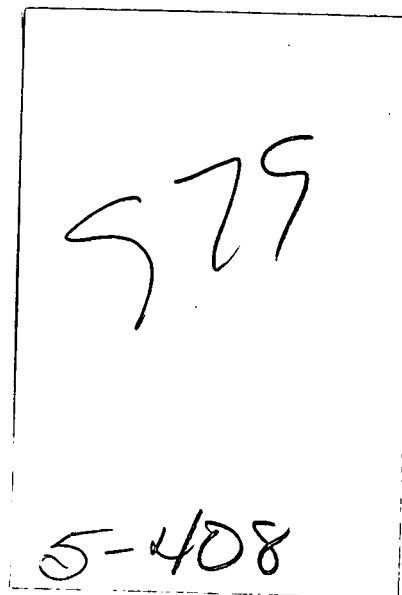
Dear Mr. Reising:

This letter provides Ohio EPAs comments on the draft "Operations and Maintenance Master Plan for the Aquifer Restoration and Wastewater Treatment Project".

If you have any questions, please contact Tom Ontko or me.

Sincerely,

for Tom Ontko

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversightcc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Dave Ward, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR, CO

O&MMPARP.LTT

Ohio Environmental Protection Agency Comments on the Operations and Maintenance Master Plan for the Aquifer Restoration and Wastewater Treatment Project

- 1) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #: 3.0 Descriptions of Major ARWWP Components Pg. #: 3-4 Line # 23 Code: C
Original Comment #
Comment: The text should state how it will be determined if the injection system is viable.

- 2) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #: 3.0 Descriptions of Major ARWWP Components Pg. #: 3-5 Line # 24-26 Code: C
Original Comment #
Comment: The total number of planned injection wells for the South Field Injection System is not apparent. It appears that the text indicates that the South Field Injection System will include five newly installed injection wells and three injection wells converted from the South Field Extraction System Module for a total of nine injection wells. Figure 3-3 and the text found in RAWP-3 Final, Revision 0, June 24, 1997, pg 18, first paragraph both describe the conversion of four extraction wells to injection wells. Please clarify whether three or four wells will be converted from extraction to injection. Additionally, it would be useful to identify these by well ID in Section 4.

- 3) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #: 3.0 Descriptions of Major ARWWP Components Pg. #: 3-6 Line # Code: C
Original Comment #
Comment: Sections 3.1.2.1 and 3.1.2.2 should include the anticipated extraction and injection rates or reference a specific table that includes these values.

- 4) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #: 3.0 Descriptions of Major ARWWP Components Pg. #: 3-25 Line # 4-6 Code: C
Original Comment #
Comment: The radionuclides to be analyzed for should be specified or reference to the appropriate document provided.

- 5) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #: 3.0 Descriptions of Major ARWWP Components Pg. #: 3-25 Line # 21-22 Code: C
Original Comment #
Comment: The text should further define what excessive precipitation is or refer to another section that quantifies this factor. What determines when the precipitation is excessive?

- 6) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #: 5.0 Operations Plan Pg. #: Line # Figure 5-2 Code: C
Original Comment #
Comment: The decision flow chart references numerous SOP's. Specifically where are these SOP's documented and how do the operations interface?

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- 7) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:3.0 Descriptions of Major ARWWP Components Pg. #: 3-1 Line # 29 Code: E
Original Comment #
Comment: The text "is provide" should be replaced with "are provided".
- 8) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:3.0 Descriptions of Major ARWWP Components Pg. #: 3-19 Line #30 Code: E
Original Comment #
Comment: The word "allows" should be replaced with "allow".
- 9) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:3.0 Descriptions of Major ARWWP Components Pg. #: 3-26 Line # 1 Code: E
Original Comment #
Comment: The text should provide flow units (lb/gal) to allow for verification of the conversion factor 8.34.
- 10) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:3.0 Descriptions of Major ARWWP Components Pg. #: 3-26 Line # 4-20 Code: E
Original Comment #
Comment: The text should provide a reference for the adjusted average monthly uranium concentration calculation method specified, in particular the use of 10 allowable by-pass concentrations.
- 11) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:4.0 Projected Flows Pg. # Figure 4-2: Line # Code: E
Original Comment #
Comment: For clarity the title of the figure should be "Projected Yearly Average Total Groundwater Extraction Rate."
- 12) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:4.0 Projected Flows Pg. # Figure 4-5: Line # Code: E
Original Comment #
Comment: For clarity the title of the figure should be "Projected Yearly Average Stormwater Flow Rate."
- 13) Commenting Organization: Ohio EPA Commentor: HSI GeoTrans, Inc.
Section #:5.0 Projected Flows Pg. # Figure 5-2: Line # Code: E
Original Comment #
Comment: Typo errors, "avaiable" should be "available".